

UNION PACIFIC RAILROAD COMPANY

K. R. (KEN) WELCH
Assistant Vice President
Environmental Management



Mailing Address:
Room 930
1416 Dodge Street
Omaha, Nebraska 68179
Fax (402) 271-4461

R. L. (RICK) EADES
Director Environmental Field Operations
W.E. (BILL) ROE
Director Track Maintenance - Safety

Directors Environmental Field Operations
B. A. (BROCK) NELSON - Northern Region
L. A. (LANNY) SCHMID - Western Region
G. (GLENN) THOMAS - Southern Region

Environmental Protection
Omaha, NE

February 4, 2000

Mr. Kenneth V. Herstowski, P.E.
USEPA
RCRA Corrective Action & Permits Branch
Air, RCRA and Toxics Division
901 North 5th Street
Kansas City, KS 66101

REC'D
FEB 09 2000
RCAP

Dear Mr. Herstowski:

Please refer to the Proposed Administrative Order on Consent (the Order) for the Omaha, Nebraska Shops of the Union Pacific Railroad Company. More specifically, the site is described as 9th and Cass Streets, Omaha, Nebraska, RCRA I.D. No. NED000829754. In addition, please refer to my letter to you dated January 7, 2000, regarding the submittal of several documents for your review.

After submittal of the documents to you in January we discovered that the certification pages were erroneously not included. Therefore, I am enclosing three copies of each certification page for the documents in your possession, as well as one copy of each certification page for forwarding to the Nebraska Department of Environmental Quality (NDEQ). Those documents for which the certification pages are sent are as follows:

1. Draft Corrective Measures Study Operable Unit No. 1 (OU1), December 1999.
2. Planning Memorandum - Asbestos Area Interim Measures, January 3, 2000.
3. Planning Memorandum - Paint Barrel Pits Interim Measures, January 3, 2000 (SWMU 14).



R00157942
RCRA RECORDS CENTER

4. Planning Memorandum - Acetylene Sludge Pits Interim Measures, January 3, 2000 (SWMU 20).

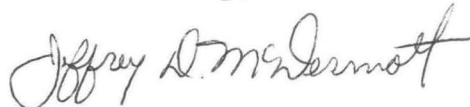
A document included in a transmittal to Mr. Grant Yang of NDEQ on January 7, 2000, was a Planning Memorandum dated January 4, 2000, describing a remedy for the remediation of petroleum contaminated soil using thermal treatment. A copy of the letter and Planning Memorandum was forwarded to you as information. Input provided by the City of Omaha and other agencies on the ability of Union Pacific to obtain a permit in a timely manner for the thermal treatment of the soil indicated to Union Pacific an alternative remedy should be considered. Therefore, disposal of the petroleum contaminated soil at an approved disposal facility off site is now the preferred remedy. A revised Planning Memorandum will be submitted to the NDEQ soon with a copy being forwarded to you. The thermal treatment unit that was to be utilized for petroleum contamination was to also be used to treat contaminants in completing the interim measure for the Acetylene Sludge Pits. However, since the thermal treatment unit will not now be utilized in the remediation of petroleum contaminated soil, the interim measure proposed in the Planning Memorandum for treatment of the Acetylene Sludge Pits is not viable. Therefore, the Union Pacific respectfully withdraws the request for EPA review and approval of the Planning Memorandum - Acetylene Sludge Pits Interim Measures, January 3, 2000 (SWMU 20).

The Union Pacific is endeavoring to maintain its schedule for investigation and remediation of the site. In order to satisfy the schedule Union Pacific has developed, the Union Pacific hereby submits to EPA three copies of the draft RFI Work Plan Operable Units 2 and 3 (OU2 and OU3). This document is dated January 2000. Please review the draft RFI Work Plan and furnish me with your comments at your earliest convenience. In order to expedite obtaining data on what we perceive as data gaps, we plan to be in the field in late February 2000 conducting additional investigation. One additional copy of the draft RFI Work Plan is being transmitted to you for forwarding to the RCRA Section of NDEQ. The Railroad's understanding is that EPA will forward all documents to NDEQ for their review and request they provide EPA with comments.

In closing, I wish to inform you that per our discussion of January 28, 2000, the Union Pacific will be submitting a revised draft CMS for OU1 within three weeks. The revised draft will include an alternative remedy for the lead contaminated soil.

We are very appreciative of your assistance in the development of this project. If you wish to call me to discuss any aspect of the work please contact me at (402) 271-3675.

Yours truly,

A handwritten signature in cursive script, reading "Jeffrey D. McDermott".

Jeffrey D. McDermott, P.E.

Mgr. Environmental Site Remediation

ENC

C: Theodore L. Huscher - NDEQ (W/ENC)
Norman Jackman - City of Omaha (W/ENC)
C. Dale Jacobson - Jacobson Helgoth (W/ENC)
Denny Brown - UPRR
Jeff Smith - URSGWC

**CORRECTIVE MEASURES STUDY
OPERABLE UNIT NO. 1**

**UNION PACIFIC RAILROAD
OMAHA SHOPS**

Union Pacific Railroad Company
1416 Dodge Street
Omaha, Nebraska 68179

RCAP
FEB 09 2000
REC'D

CERTIFICATION

"I certify that this document and all attachments hereto were prepared under my direction or supervision. To the best of my knowledge, information and belief, the information submitted is true, accurate and complete. I am aware that there are criminal penalties for knowingly providing false information."

Signature: Jeffrey D. McDermott
Name: Jeffrey D. McDermott
Title: Mgr. Environmental Site Remediation
Date: 1-7-2000

**ASBESTOS AREA INTERIM MEASURES
OPERABLE UNIT NO. 1**

**UNION PACIFIC RAILROAD
OMAHA SHOPS**

Union Pacific Railroad Company
1416 Dodge Street
Omaha, Nebraska 68179

REC'D
FEB 09 2000
RCAP

CERTIFICATION

"I certify that this document and all attachments hereto were prepared under my direction or supervision. To the best of my knowledge, information and belief, the information submitted is true, accurate and complete. I am aware that there are criminal penalties for knowingly providing false information."

Signature: Jeffrey D. McDermott
Name: Jeffrey D. McDermott
Title: Mgr. Environmental Site Remediation
Date: 1-7-2000

**PAINT BARREL PITS INTERIM MEASURES
OPERABLE UNIT NO. 2**

**UNION PACIFIC RAILROAD
OMAHA SHOPS**

Union Pacific Railroad Company
1416 Dodge Street
Omaha, Nebraska 68179

REC'D
FEB 09 2000
RCAP

CERTIFICATION

"I certify that this document and all attachments hereto were prepared under my direction or supervision. To the best of my knowledge, information and belief, the information submitted is true, accurate and complete. I am aware that there are criminal penalties for knowingly providing false information."

Signature: Jeffrey D. McDermott
Name: Jeffrey D. McDermott
Title: Mgr. Environmental Site Remediation
Date: 1-7-2000

**ACETYLENE SLUDGE PITS INTERIM MEASURES
OPERABLE UNIT NO. 2**

**UNION PACIFIC RAILROAD
OMAHA SHOPS**

Union Pacific Railroad Company
1416 Dodge Street
Omaha, Nebraska 68179

REC'D
FEB 09 2000
RCAP

CERTIFICATION

"I certify that this document and all attachments hereto were prepared under my direction or supervision. To the best of my knowledge, information and belief, the information submitted is true, accurate and complete. I am aware that there are criminal penalties for knowingly providing false information."

Signature: Jeffrey D. McDermott
Name: Jeffrey D. McDermott
Title: Mgr. Environmental Site Remediation
Date: 1-7-2000